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April 7, 2025

VIA ECF

Hon. Katharine H. Parker
United States Magistrate Judge
United States District Court, Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: Averbach et al. v. Cairo Amman Bank, Index No. 19-cv-00004

Dear Judge Parker:

Pursuant to the Court's order dated February 6, 2025 (ECF 317), we write on behalf of all parties to provide a status report regarding expert discovery and to propose a schedule for briefing CAB's motion to exclude certain testimony of Plaintiffs' experts.

The parties have scheduled the depositions of 12 of the 22 experts collectively disclosed in this case. The parties anticipate completing these 12 expert depositions before July 31, 2025, the current expert discovery deadline.

Plaintiffs have requested to postpone scheduling the remaining 10 experts' depositions (all CAB experts) until the Court decides Plaintiffs' motion to exclude those experts' testimony (ECF 313). Plaintiffs requested oral argument on their motion, and the Court scheduled that argument for June 24, 2025. Some or all of these depositions will likely need to occur after the current deadline for completion of expert discovery (unless the Court excludes all of their testimony in its entirety). *See* ECF 343. CAB does not object to deferring these experts' depositions provided that doing so does not prejudice CAB.

Regarding CAB's anticipated motion to exclude certain testimony of Plaintiffs' experts, according to the current schedule, CAB expects to complete deposing all of Plaintiffs' experts on Thursday, July 10. Accordingly, the parties propose the following schedule for CAB's motion to exclude:

Event	Deadline
CAB's motion to exclude	Thursday, August 7, 2025



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Plaintiffs' opposition	Thursday, August 28, 2025
CAB's reply	Thursday, September 18, 2025

Respectfully submitted,

A handwritten signature in black ink that reads 'Samantha Lee Chaifetz'.

Samantha Chaifetz

cc: All Counsel of Record (via ECF)